

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

EUCLIDES SOTO, LOUIS A. MARTINEZ,  
JOSE RAMIREZ, CLEMENTE HERNANDEZ,  
CESAR PIZARO, ELISON PENA,  
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,  
ANGEL BAEZ, ANTONIO MARTINEZ,  
WILFREDO ORTIZ, EULOGIO ORTIZ,  
MIRRAIN MIRANDA, RAFAEL MORENO,  
NELSON ACEVEDO, and  
RAMON RODRIQUEZ,

Plaintiffs,

v.

UNITED STEELWORKERS OF AMERICA,  
LOCAL 421-U, and UNITED STEELWORKERS  
OF AMERICA,

Defendants.

---

Civil Action No.  
04-10892-JLT

**MOTION FOR LEAVE TO FILE A REPLY TO PLAINTIFFS' OPPOSITION TO  
UNION'S MOTION TO STRIKE PORTIONS OF SECOND AMENDED COMPLAINT,  
OR, IN THE ALTERNATIVE, FOR A CONTINUANCE TO ENGAGE IN  
FURTHER DISCOVERY REGARDING NEWLY ASSERTED CLAIMS**

Pursuant to Local Rule 7.1(B)(3), now come the Defendants United Steel, Paper, and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Local Union 421-U (the Local) and United Steel, Paper, and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO/CLC (the International) (collectively, the Union) and hereby seek leave of the Court to file a reply to the Plaintiffs' opposition to the Union's motion to strike portions of the Second Amended Complaint.

As grounds for this motion, the Union states that the Plaintiffs have made material misrepresentations in their opposition that the Union is seeking to correct through the filing of a reply.

WHEREFORE, the Union respectfully requests that the Court grant it leave to file a brief reply to the Plaintiffs' opposition to the Union's motion.

Respectfully submitted,

Dated: March 31, 2006

s/Alfred Gordon  
Harold L. Lichten, BBO # 549689  
Alfred Gordon, BBO # 630456  
PYLE, ROME, LICHTEN, EHRENBURG  
& LISS-RIORDAN, P.C.  
18 Tremont St., Ste. 500  
Boston, MA 02108  
(617) 367-7200

Robert Alexander, *pro hac vice*  
BREDHOFF & KAISER, P.L.L.C.  
805 Fifteenth Street, N.W.  
Washington, D.C. 20005-2207  
(202) 842-2600

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served by electronic filing on the attorneys of record for each party on March 31, 2006, and by U.S. Mail on those who cannot receive electronic filings.

s/Alfred Gordon  
Alfred Gordon